

With regards to RM-10995, Petition to establish rules to allow displaced FM Translators to change to a new channel. I support this initiative.

I represent Oregon Public Broadcasting, an operator of 25 FM Translators in our state network. We provide service to about 85% of the population of the State of Oregon. We have had several occasions in which an existing translator, that has provided reliable service to the Public for a number of years, has been threatened by the granting of a new NCE station. This has often led to our needing to expend precious financial resources to also apply for a new NCE, just to maintain our basic service. Unlike TV, which does have such a provision to "Displace," to a new channel when a frequency conflict is generated, Radio has no such provision. TV has many pathways to deliver the program content. Cable, Satellite, etc... Radio, on the other hand, is basically an over the air media, and often used primarily in a mobile environment. The importance of maintaining an interference free service is paramount. And giving FM Translators an option to seek out the best available channel would be a small compensation to retain their program service, regardless of their "Secondary," status.

Please consider this proposed ruling in the most positive of terms.

Sincerely, Everett E Helm, Director of Engineering, RF Systems